REMARKS

Claims 1-24 are pending in the present application.

REJECTIONS UNDER 35 U.S.C. § 102(e)

Claims 1-24 were rejected under 35 U.S.C. § 102(e) as being anticipated by

Publication No. US 2002/0038398 to Morrison et al. ("Morrison").

According to an embodiment of the present invention, a multi-node system is

provided that allows for locked-bus transactions. Claim 1, for example, recites a method

for executing a locked-bus transaction on a multi-node system. A locked bus transaction

is initiated at a bus agent, such as a processor (see, e.g., p. 7, lines 12-13). A locked bus

request is transmitted to a first node controller in the multi-node system. Then the locked

bus transaction is deferred at the bus agent by the first node controller. Similar

limitations appear in independent method claims 19 and 21. Independent system claim

10 refers to a first node controller that is to defer a locked transaction initiated by a bus

agent at the bus agent.

According to an embodiment of the present invention, the node controller sends

the locked bus request to a second node controller, which in turn, prevents bus

transactions on a bus coupled to it. At this point, the locked-bus transaction can be

performed by the bus agent over the multi-node system (see, e.g., claim 4, the Abstract of

the Disclosure, and p. 9, lines 17-23 of the present specification).

The Morrison reference does not disclose, teach or suggest, *inter alia*, a node

controller that defers a locked bus transaction at a bus agent as recited in independent

claims 1, 10, 19, and 21. It is noted that the disclosure of Morrison has several labeling

errors. As shown in Fig. 1, a plurality of nodes are provided, 101, ..., 107, 108, and 109.

Each node includes a number of processors (see node 101 with processors 102 and 103)

coupled to a bus (e.g., bus 116) and a controller (e.g., controller 116). As described at

paragraph 0025 of Morrison, controller 116 (sic, 106?) receives a locked transaction

request from one of the processors 223 and 224 (sic, 103 and 104?) via bus 116 (sic,

106?) and connection 219. It is noted that element numbers 223 and 224 are not in the

drawings of Morrison. Paragraph 0025 further states that snoop response generation 210

retries the transaction on bus 116 (sic,106?). In parallel, the controller processes the

request and seeks to acquire semaphore 129 in a memory coupled to bus 115 (see para.

0026). After acquiring the semaphore, the controller 106 issues an IOKILL signal on bus

115 to clear transactions on bus 115 (see para. 0027). Once bus 115 is clear of

transactions and semaphore 129 of memory 126 is acquired, the controller 106 (via

request generate 201) issues the locked transaction onto bus 115 (see, e.g., para. 0029).

The system of Morrison is one where a locked transaction initiated by a bus agent

is received at a controller, which seeks to terminate accesses to a secondary bus and a

memory target so that the controller can reformat the locked transaction for the secondary

bus. Nowhere in Morrison is it suggested that the controller defer the locked-bus

transaction at the bus agent. The only interaction between the controller 116 and the bus

agent (processor 103, 104) is the transfer of the locked-bus transaction. In other words,

the locked-bus transaction is not deferred at processor 103, 104 by the controller, instead

it is processed by the controller so that processor 103, 104 may complete the transaction.

It is noted that the word "deferred" does appear in paragraph 0035. In that case,

the disclosure of Morrison is referring to the transaction of processors other than the

processor initiating the locked transaction). Nowhere in Morrison does it teach of suggest deferring the locked bus transaction at a bus agent by the first node controller as recited in the pending claims.

Since features of the present invention are not disclosed in, nor taught by, the Morrison reference, reconsideration and withdrawal of the rejection of claims 1-24 under 35 U.S.C. § 102(e) is respectfully requested.

CONCLUSION

The Applicants respectfully submit that the present case is in condition for allowance and respectfully requests that the Examiner issue a notice of allowance.

The Office is hereby authorized to charge any fees determined to be necessary under 37 C.F.R. § 1.16 or § 1.17 or credit any overpayment to Kenyon & Kenyon **Deposit Account No. 11-0600**.

The Examiner is invited to contact the undersigned at (202) 220-4255 to discuss any matter concerning this application.

Respectfully submitted,

Dated: September 15, 2003

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